

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Frank joseph Keough Maria Concetta Keough Debtor ----- Village Capital & Investment, LLC Movant v. Frank joseph Keough Maria Concetta Keough Respondent Scott F. Waterman, Trustee Additional Respondent	Case Number: 19-13280-elf CHAPTER: 13
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PRAECIPE TO WITHDRAW NOTICE OF PAYMENT CHANGE

Kindly withdraw the Notice of payment change of Village Capital & Investment, LLC filed on 12/27/2019 under claim 11-1 without prejudice.

Respectfully Submitted:

Stern & Eisenberg, PC

By: /s/ Daniel Jones

Daniel Jones, Esquire

Stern & Eisenberg, PC

1581 Main Street, Suite 200

The Shops at Valley Square

Warrington, PA 18976

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Facsimile: (215) 572-5025

Bar Number: 321876

djones@sterneisenberg.com

Date: March 17, 2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THE FOREGOING NOTICE OF PAYMENT CHANGE WAS SERVED ELECTRONICALLY THROUGH THE COURT'S ECF SYSTEM AT THE E-MAIL ADDRESS REGISTERED WITH THE COURT ON THIS DATE TO THE FOLLOWING:

DATE: March 17, 2020

Charles Laputka
Laputka Law Office
1344 W. Hamilton St.
Allentown, PA 18102
claputka@laputkalaw.com
Counsel for Debtor

Scott F. Waterman (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
info@ReadingCh13.com
Bankruptcy Trustee

U.S. Trustee
Office of the U.S. Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106
USTPRegion03.PH.ECF@usdoj.gov
US Trustee

and by standard first class mail postage prepaid to:

Frank Joseph Keough
2018 Pierce Drive
Whitehall, PA 18052

Maria Concetta Keough
2018 Pierce Drive
Whitehall, PA 18052
Debtor(s)

Respectfully submitted:
By: /s/ Daniel Jones, Esquire
Daniel Jones, Bar No: 321876
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